

Application No.: 09/933,956

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Docket No.: 324212009600

REMARKS

Claims 1-5, 7, 8, 10-14, 26, 28, 30 and 32 were pending. Claims 1-5, 7, 8, 10-14, 26, 28, 30 and 32 were rejected. By virtue of this response, claims 26 and 28 are cancelled, claims 1, 3, 5, 10, 11, 13, 14, and 30 are amended, and new claim 33 is added. Accordingly, claims 1-5, 8, 10-14, 30, and 33 are currently under consideration. Amendment of subject matter is not to be construed as an abandonment of any subject matter. No new matter is added by virtue of these amendments.

Claim Rejections Under 35 USC §102

Claims 1, 3-5, 7-8, 12-14, 26, and 30 are rejected under 35 U.S.C. 102(e) as being anticipated by Ladd et al (U.S. Patent: 6,269,336).

Claim 1 is amended. Amended claim 1 now recites a method comprising, in part, the following:

- “[A]ssociating tags with portions of audio content, each tag including relevancy information including one or more of a location, a context, and a device for a portion of audio content.”

Applicant respectfully submits that Ladd does not disclose or suggest that a tag associated with audio content can include location, context and device information for which that audio content is applicable.

- “[R]eceiving a request for information...obtaining information about the request [and] rendering, for the communication device, the information and one or more of the portions of audio content selected based on the information obtained about the request and at least some of the information in the tags.”

Applicant also submits that Ladd does not disclose or suggest selecting audio content based on information obtained about a request for information and tag information as recited above.

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Claim 26

For ease of amendment, claim 26 was cancelled in favor of a new claim 33.

Ladd does not disclose or suggest at least an audio prompt database including a plurality of utterances that potentially correspond to a first text string to be rendered, where each of the plurality of utterances associated with a unique prompt identification, and a prompt mapping configuration containing a plurality of occurrences of the first text string, each of the occurrences associated with a unique prompt class, and one of the prompt identifications of the audio prompt database. Ladd also does not disclose or suggest a prompt audio object operable to use information obtained in the voice browser session to determine a prompt class in which to match the first text string to a prompt identification of the prompt mapping configuration, and an utterance to render by matching the determined prompt identification to its associated utterance in the audio prompt database.

"Class"

The rejection cited Ladd 37:8-34 as teaching "Field (class) attribute that is used as an identifier to produce one of a plurality of specific prompts" (emphasis omitted) (Non-Final Rejection, page 4.)

Applicants respectfully submit that the class concept introduced in Ladd is distinguishable from the present claims 1 and 33 at least as described below.

For one thing, the use of "class" in Ladd is to "define a set of elements that are to be reused within the content of a dialog. For example, application developers can define a set of elements once, and then use them several times." (31:55-59.) Further information about the usage of "class" in Ladd can be found in the example at (32:6-21) and in the explanation of that example in (32:25-35.) The example is that the "CLASS element can be used to define the default behavior of an ERROR element, a HELP element, and a CANCEL element, within a given DIALOG element. The CLASS element can be contained by a DIALOG element."

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The effect of the above usage of the CLASS element is that "[w]hen interpreted by the voice browser, the STEP element will behave as if the HELP and ERROR elements that are defined in the CLASS element were defined explicitly in the steps themselves."

Thus, Applicant submits that these "class" disclosures of Ladd do not teach or suggest:

"associating tags with portions of audio content, each tag specifying information including one or more of a location, a context, and a device for which that portion of audio content is applicable ... obtaining information about the request ... rendering, for the communication device, the information and one or more of the portions of audio content selected based on the information obtained about the request and at least some of the information in the tags," as recited in claim 1.

Applicant further submits that these disclosures do not teach or suggest that a first text string can be associated with a plurality of prompt classes and utterances, where the prompt classes are used in conjunction with other information to determine an utterance to render for the first text string, per claim 33.

For at least the above reasons, Applicant submits that claims 1 and 33 are allowable over Ladd.

#### Claim Rejections Under 35 USC §103

Claims 2, 10-11, and 32 are rejected under 35 U.S.C. 103(a) as being unpatentable over Ladd et al (U.S. Patent: 6,269,336) in view of Uppaluru (U.S. Patent: 5,915,001).

Claims 1 and 33 are the independent claims currently under consideration. Uppaluru was cited for disclosures relating to caching of voice browser content. Although Applicants do not hereby concede that the combination of Uppaluru and Ladd satisfies the requisite motivation to combine or taught such caching, Applicant also respectfully submits that the present amendments to claim 1 and new claim 33 distinguish the combination of Ladd and Uppaluru. Therefore, Applicant

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submits that claims 1 and 33 and their dependents are patentable over Ladd in view of Uppaluru and request withdrawal of the rejection.

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CONCLUSION

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

In the event the U.S. Patent and Trademark office determines that an extension and/or other relief is required, applicant petitions for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to Deposit Account No. 03-1952 referencing docket no. 324212009600. However, the Commissioner is not authorized to charge the cost of the issue fee to the Deposit Account.

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Respectfully submitted,

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